

1 J. Andrew Coombs (SBN 123881)  
andy@coombsp.com  
2 Nicole L. Drey (SBN 250235)  
nicole@coombsp.com  
3 J. Andrew Coombs, A Prof. Corp.  
517 East Wilson Avenue, Suite 202  
4 Glendale, California 91206  
Telephone: (818) 500-3200  
5 Facsimile: (818) 500-3201

JS-6

6 Attorneys for Plaintiff  
Warner Bros. Home Entertainment Inc.

7 Tyler Brawley  
8 tylerbrawley@me.com  
5295 Rome Beauty Park  
9 Salt Lake City, Utah 84123  
Telephone: (801) 633-4679

10 Defendant, *in pro se*

11  
12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14

15 Warner Bros. Home Entertainment Inc.,

16 Plaintiff,

17 v.

18 Chris Clanton, et al.,

19 Defendants.  
20

Case No. CV12-6524 RGK (SHx)

[PROPOSED] CONSENT DECREE  
AND PERMANENT INJUNCTION

21 The Court, having read and considered the Joint Stipulation for Entry of  
22 Consent Decree and Permanent Injunction that has been executed by Plaintiff Warner  
23 Bros. Home Entertainment Inc. ("Plaintiff") and Defendant Tyler Brawley  
24 ("Defendant") in this action, and good cause appearing therefore, hereby:

25 ORDERS that based on the Parties' stipulation and as to Defendant, his  
26 successors, heirs, and assignees, this Injunction shall be and is hereby entered in the  
27 within action as follows:  
28

1) This Court has jurisdiction over the parties to this action and over the subject matter hereof pursuant to 17 U.S.C. § 101 *et seq.*, and 28 U.S.C. §§ 1331 and 1338. Service of process was properly made against Defendant.

2) Plaintiff owns or controls the copyright or pertinent exclusive right to distribute or license the distribution of home video and digital products, including video home cassettes (VHS) as well as optical discs, including, but not limited to, digital versatile discs (DVDs) and Blu-ray discs (collectively “Media Products”) incorporating the motion picture or television titles subject to the copyright registrations listed in Exhibit “A” attached hereto and incorporated herein by this reference (collectively referred to herein as “Plaintiff’s Works”).

3) Plaintiff has alleged that Defendant has made unauthorized uses of Plaintiff’s Works or substantially similar likenesses or colorable imitations thereof.

4) Defendant denies any unauthorized uses of Plaintiff’s Works or substantially similar likenesses or colorable imitations thereof.

5) Defendant and his agents, servants, employees, representatives, successor and assigns, and all persons, firms, corporations or other entities in active concert or participation with him who receive actual notice of the Injunction are hereby restrained and permanently enjoined from infringing – directly, contributorily or vicariously – or enabling, facilitating, permitting, assisting, soliciting, encouraging, inducing, authorizing, aiding or abetting, materially contributing to, or persuading anyone to infringe in any manner Plaintiff’s Works, including, but not limited to, the following:

- a) Copying, reproducing, downloading, distributing, uploading, linking to, transmitting, or publicly performing, or using trademarks, trade names or logos in connection with unauthorized Media Products containing any of Plaintiff’s Works;

- 1           b)    Enabling, facilitating, permitting, assisting, soliciting, encouraging,  
2                abetting, or inducing any person or entity to copy, reproduce, download,  
3                distribute, upload, link to, transmit, or publicly perform any of Plaintiff's  
4                Works; or
- 5           c)    Profiting from the unauthorized copying, reproduction, downloading,  
6                distribution, uploading, linking to, transmission, or public performance of  
7                any of Plaintiff's Works while declining to exercise a right to stop or limit  
8                such unauthorized copying, reproduction, downloading, distribution,  
9                uploading, linking to, transmission, or public performance of any of  
10              Plaintiff's Works.
- 11   6)   Each side shall bear its own fees and costs of suit.
- 12   7)   Except as provided herein, all claims alleged in the Complaint as to Defendant  
13       are dismissed with prejudice. All claims alleged in the Complaint as to co-Defendant  
14       Chris Clanton are dismissed without prejudice.
- 15   8)   This Injunction shall be deemed to have been served upon Defendant at the time  
16       of its execution by the Court.
- 17   9)   The Court finds there is no just reason for delay in entering this Injunction and,  
18       pursuant to Rule 54(a) of the Federal Rules of Civil Procedure, the Court directs  
19       immediate entry of this Injunction against Defendant.
- 20   10)   The Court shall retain jurisdiction of this action to entertain such further  
21       proceedings and to enter such further orders as may be necessary or appropriate to  
22       implement and enforce the provisions of this Injunction.
- 23   11)   The above-captioned action, shall, upon filing by Plaintiff of the Settlement  
24       Agreement, Stipulation for Entry of Judgment and Judgment Pursuant to Stipulation,  
25       and requesting entry of judgment against Defendant, be reopened should Defendant  
26       default under the terms of the Settlement Agreement.
- 27  
28

12) This Court shall retain jurisdiction over Defendant for the purpose of making further orders necessary or proper for the construction or modification of this consent decree and judgment; the enforcement hereof; the punishment of any violations hereof; and for the possible entry of a further Judgment Pursuant to Stipulation in this action.

DATED: May 17, 2013



---

Hon. R. Gary Klausner  
United States District Judge

PRESENTED BY:

J. Andrew Coombs, A Prof. Corp.

By: \_\_\_\_\_  
J. Andrew Coombs  
Nicole L. Drey  
Attorneys for Plaintiff Warner Bros. Home  
Entertainment Inc.

Tyler Brawley

By: \_\_\_\_\_  
Tyler Brawley  
Defendant, *in pro se*

**EXHIBIT A**  
**COPYRIGHT REGISTRATIONS**

<b><u>Registration No.</u></b>	<b><u>Title</u></b>	<b><u>Copyright Claimant</u></b>
PA 1-800-005	CHUCK: Chuck Versus The Zoom	Warner Bros. Entertainment Inc. ("WBEI")
PA 1-800-007	CHUCK: Chuck Versus The Goodbye	WBEI
PA 1-697-280	ENTOURAGE: Stunted	Home Box Office, Inc. ("HBO")
PA 1-697-285	ENTOURAGE: Buzzed	HBO
PA 1-704-328	ENTOURAGE: Dramedy	HBO
PA 1-699-106	ENTOURAGE: Tequila Sunrise	HBO
PA 1-699-105	ENTOURAGE: Bottoms Up	HBO
PA 1-706-302	ENTOURAGE: Hair	HBO
PA 1-706-285	ENTOURAGE: Tequila And Coke	HBO
PA 1-706-311	ENTOURAGE: Sniff Sniff Gang Bang	HBO
PA 1-706-303	ENTOURAGE: Porn Scenes From An Italian Restaurant	HBO
PA 1-706-307	ENTOURAGE: Lose Yourself	HBO
PA 1-798-788	GOSSIP GIRL: Belles De Jour	WBEI
PA 1-798-808	GOSSIP GIRL: Double Identity	WBEI
PA 1-798-791	GOSSIP GIRL: The Undergraduates	WBEI
PA 1-798-782	GOSSIP GIRL: Touch Of Eva	WBEI
PA 1-798-779	GOSSIP GIRL: Goodbye, Columbia	WBEI
PA 1-798-796	GOSSIP GIRL: Easy J	WBEI
PA 1-798-800	GOSSIP GIRL: War At The Roses	WBEI
PA 1-798-805	GOSSIP GIRL: Juliet Doesn't Live Here Anymore	WBEI

1	PA 1-798-776	GOSSIP GIRL: The Witches Of Bushwick	WBEI
2	PA 1-798-706	GOSSIP GIRL: Gaslit	WBEI
3	PA 1-798-803	GOSSIP GIRL: The Townie	WBEI
4	PA 1-798-675	GOSSIP GIRL: The Kids Are Not All Right	WBEI
5	PA 1-798-813	GOSSIP GIRL: Damien Darko	WBEI
6	PA 1-798-793	GOSSIP GIRL: Panic Roommate	WBEI
7	PA 1-798-778	GOSSIP GIRL: It-Girl Happened One Night	WBEI
8	PA 1-798-700	GOSSIP GIRL: While You Weren't Sleeping	WBEI
9	PA 1-798-784	GOSSIP GIRL: Empire of The Son	WBEI
10	PA 1-798-783	GOSSIP GIRL: The Kids Stay In The Picture	WBEI
11	PA 1-798-694	GOSSIP GIRL: Petty In Pink	WBEI
12	PA 1-798-660	GOSSIP GIRL: The Princess And The Frog	WBEI
13	PA 1-798-713	GOSSIP GIRL: Shattered Bass	WBEI
14	PA 1-798-789	GOSSIP GIRL: The Wrong Goodbye	WBEI
15	PA 1-794-685	PRETTY LITTLE LIARS (SERIES): It's Alive	WBEI
16	PA 1-794-687	PRETTY LITTLE LIARS (SERIES): The Goodbye Look	WBEI
17	PA 1-794-816	PRETTY LITTLE LIARS (SERIES): My Name Is Trouble	WBEI
18	PA 1-794-688	PRETTY LITTLE LIARS (SERIES): Blind Dates	WBEI
19	PA 1-794-823	PRETTY LITTLE LIARS (SERIES): The Devil You Know	WBEI
20	PA 1-794-778	PRETTY LITTLE LIARS (SERIES): Never Letting Go	WBEI

1	PA 1-794-827	PRETTY LITTLE LIARS (SERIES): Surface Tension	WBEI
2			
3	PA 1-794-765	PRETTY LITTLE LIARS (SERIES): Save The Date	WBEI
4			
5	PA 1-794-790	PRETTY LITTLE LIARS (SERIES): Picture This	WBEI
6			
7	PA 1-794-831	PRETTY LITTLE LIARS (SERIES): Touched By An 'A'-Angel	WBEI
8			
9	PA 1-794-686	PRETTY LITTLE LIARS (SERIES): I Must Confess	WBEI
10			
11	PA 1-794-756	PRETTY LITTLE LIARS (SERIES): Over My Dead Body	WBEI
12			
13	PA 1-794-834	PRETTY LITTLE LIARS (SERIES): The First Secret	WBEI
14			
15	PA 1-794-837	PRETTY LITTLE LIARS (SERIES): Through Many Dangers, Toils and Snares	WBEI
16			
17	PA 1-794-838	PRETTY LITTLE LIARS (SERIES): A Hot Piece of "A"	WBEI
18			
19	PA 1-794-839	PRETTY LITTLE LIARS (SERIES): Let The Water Hold Me Down	WBEI
20			
21	PA 1-794-844	PRETTY LITTLE LIARS (SERIES): The Blonde Leading The Blind	WBEI
22			
23	PA 1-794-848	PRETTY LITTLE LIARS (SERIES): A Kiss Before Lying	WBEI
24			
25	PA 1-794-689	PRETTY LITTLE LIARS (SERIES): The Naked Truth	WBEI
26			
27	PA 1-794-740	PRETTY LITTLE LIARS (SERIES): CTRL: A	WBEI
28			
	PA 1-794-797	PRETTY LITTLE LIARS (SERIES): Breaking The Code	WBEI

PA 1-794-699	PRETTY LITTLE LIARS (SERIES): Father Knows Best	WBEI
PA 1-794-713	PRETTY LITTLE LIARS (SERIES): The Eye Of The Beholder	WBEI
PA 1-794-693	PRETTY LITTLE LIARS (SERIES): If These Dolls Could Talk	WBEI
PA 1-794-758	PRETTY LITTLE LIARS (SERIES): Unmasked	WBEI
PA 1-801-541	THE BIG BANG THEORY: The Robotic Manipulaton	WBEI
PA 1-801-374	THE BIG BANG THEORY: The Cruciferous Vegetable Amplification	WBEI
PA 1-801-411	THE BIG BANG THEORY: The Zazzy Substitution	WBEI
PA 1-801-531	THE BIG BANG THEORY: The Hot Troll Deviation	WBEI
PA 1-801-539	THE BIG BANG THEORY: The Desperation Emanation	WBEI
PA 1-801-425	THE BIG BANG THEORY: The Irish Pub Formulation	WBEI
PA 1-801-527	THE BIG BANG THEORY: The Apology Insufficiency	WBEI
PA 1-801-375	THE BIG BANG THEORY: The 21- Second Excitation	WBEI
PA 1-801-519	THE BIG BANG THEORY: The Boyfriend Complexity	WBEI
PA 1-801-401	THE BIG BANG THEORY: The Alien Parasite Hypothesis	WBEI
PA 1-801-430	THE BIG BANG THEORY: The Justice League Recombination	WBEI



1	PA 1-801-421	THE BIG BANG THEORY: The Bus Pants Utilization	WBEI
2			
3	PA 1-801-538	THE BIG BANG THEORY: The Love Car Displacement	WBEI
4			
5	PA 1-801-521	THE BIG BANG THEORY: The Thespian Catalyst	WBEI
6			
7	PA 1-801-406	THE BIG BANG THEORY: The Benefactor Factor	WBEI
8			
9	PA 1-801-403	THE BIG BANG THEORY: The Cohabitation Formulation	WBEI
10			
11	PA 1-801-524	THE BIG BANG THEORY: The Toast Derivation	WBEI
12			
13	PA 1-801-407	THE BIG BANG THEORY: The Prestidigitation Approximation	WBEI
14			
15	PA 1-801-534	THE BIG BANG THEORY: The Zarnecki Incursion	WBEI
16			
17	PA 1-801-522	THE BIG BANG THEORY: The Herb Garden Germination	WBEI
18			
19	PA 1-801-382	THE BIG BANG THEORY: The Agreement Dissection	WBEI
20			
21	PA 1-801-424	THE BIG BANG THEORY: The Wildebeest Implementation	WBEI
22			
23	PA 1-801-540	THE BIG BANG THEORY: The Engagement Reaction	WBEI
24			
25	PA 1-801-517	THE BIG BANG THEORY: The Roommate Transmogrification	WBEI
26			
27	PA 1-679-184	THE PACIFIC: Part One	HBO
28			
	PA 1-687-855	THE PACIFIC: Part Two	HBO
	PA 1-679-181	THE PACIFIC: Part Three	HBO
	PA 1-683-931	THE PACIFIC: Part Four	HBO
	PA 1-683-936	THE PACIFIC: Part Five	HBO
	PA 1-683-933	THE PACIFIC: Part Six	HBO
	PA 1-683-929	THE PACIFIC: Part Seven	HBO
	PA 1-685-746	THE PACIFIC: Part Eight	HBO

1	PA 1-685-739	THE PACIFIC: Part Nine	HBO
2	PA 1-685-738	THE PACIFIC: Part Ten	HBO
3	PA 1-799-078	THE VAMPIRE DIARIES: The Return	WBEI; CBS Studios Inc. ("CBS")
5	PA 1-799-070	THE VAMPIRE DIARIES: Brave New World	WBEI; CBS
7	PA 1-799-071	THE VAMPIRE DIARIES: Bad Moon Rising	WBEI; CBS
9	PA 1-799-082	THE VAMPIRE DIARIES: Memory Lane	WBEI; CBS
11	PA 1-799-074	THE VAMPIRE DIARIES: Kill Or Be Killed	WBEI; CBS
12	PA 1-799-084	THE VAMPIRE DIARIES: Plan B	WBEI; CBS
14	PA 1-799-072	THE VAMPIRE DIARIES: Masquerade	WBEI; CBS
15	PA 1-799-073	THE VAMPIRE DIARIES: Rose	WBEI; CBS
16	PA 1-799-075	THE VAMPIRE DIARIES: Katerina	WBEI; CBS
18	PA 1-799-064	THE VAMPIRE DIARIES: The Sacrifice	WBEI; CBS
20	PA 1-799-047	THE VAMPIRE DIARIES: By The Light Of The Moon	WBEI; CBS
21	PA 1-799-065	THE VAMPIRE DIARIES: The Descent	WBEI; CBS
22	PA 1-799-067	THE VAMPIRE DIARIES: Daddy Issues	WBEI; CBS
24	PA 1-799-058	THE VAMPIRE DIARIES: Crying Wolf	WBEI; CBS
26	PA 1-799-062	THE VAMPIRE DIARIES: The Dinner Party	WBEI; CBS
27	PA 1-799-029	THE VAMPIRE DIARIES: The House Guest	WBEI; CBS

1	PA 1-799-087	THE VAMPIRE DIARIES: Know Thy Enemy	WBEI; CBS
2			
3	PA 1-799-040	THE VAMPIRE DIARIES: The Last Dance	WBEI; CBS
4	PA 1-799-042	THE VAMPIRE DIARIES: Klaus	WBEI; CBS
5	PA 1-799-038	THE VAMPIRE DIARIES: The Last Day	WBEI; CBS
6			
7	PA 1-799-045	THE VAMPIRE DIARIES: The Sun Also Rises	WBEI; CBS
8			
9	PA 1-799-086	THE VAMPIRE DIARIES: As I Lay Dying	WBEI; CBS
10	PA 1-085-787	THE WIRE: The Target	HBO
11	PA 1-085-788	THE WIRE: The Detail	HBO
12	PA 1-085-789	THE WIRE: The Buys	HBO
13	PA 1-085-790	THE WIRE: Old Cases	HBO
14	PA 1-091-735	THE WIRE: The Pager	HBO
15	PA 1-091-734	THE WIRE: The Wire	HBO
16	PA 1-085-791	THE WIRE: One Arrest	HBO
17	PA 1-112-366	THE WIRE: Lessons	HBO
18	PA 1-112-367	THE WIRE: Game Day	HBO
19	PA 1-085-792	THE WIRE: The Cost	HBO
20	PA 1-085-793	THE WIRE: The Hunt	HBO
21	PA 1-112-891	THE WIRE: Cleaning Up	HBO
22	PA 1-097-171	THE WIRE: Sentencing	HBO
23	PA 1-136-490	THE WIRE: Ebb Tide	HBO
24	PA 1-148-802	THE WIRE: Collateral Damage	HBO
25	PA 1-194-679	THE WIRE: Hot Shots	HBO
26	PAu 2-811-064	THE WIRE: Hard Cases	HBO
27	PAu 2-803-274	THE WIRE: Undertow	HBO
28	PA 1-148-601	THE WIRE: All Prologue	HBO
	PA 1-188-186	THE WIRE: Backwash	HBO
	PAu 2-787-345	THE WIRE: Duck And Cover	HBO
	PA 1-190-936	THE WIRE: Stray Sounds	HBO
	PA 1-194-673	THE WIRE: Storm Warnings	HBO

1	PA 1-201-679	THE WIRE: Bad Dreams	HBO
2	PA 1-201-678	THE WIRE: Port In A Storm	HBO
3	PA 1-246-492	THE WIRE: Time After Time	HBO
4	PA 1-246-487	THE WIRE: All Due Respect	HBO
5	PA 1-249-546	THE WIRE: Dead Soldiers	HBO
6	PA 1-249-545	THE WIRE: Amsterdam	HBO
7	PA 1-249-550	THE WIRE: Straight And True	HBO
8	PA 1-249-549	THE WIRE: Homecoming	HBO
9	PA 1-263-206	THE WIRE: Back Burners	HBO
10	PA 1-263-204	THE WIRE: Moral Midgetry	HBO
11	PA 1-263-205	THE WIRE: Slapstick	HBO
12	PA 1-263-201	THE WIRE: Reformation	HBO
13	PA 1-265-461	THE WIRE: Middle Ground	HBO
14	PA 1-265-512	THE WIRE: Mission Accomplished	HBO
15	PA 1-325-037	THE WIRE: Boys Of Summer	HBO
16	PA 1-325-038	THE WIRE: Soft Eyes	HBO
17	PA 1-325-039	THE WIRE: Home Rooms	HBO
18	PA 1-261-149	THE WIRE: Refugees	HBO
19	PA 1-261-150	THE WIRE: Alliances	HBO
20	PA 1-261-132	THE WIRE: Margin Of Error	HBO
21	PA 1-261-151	THE WIRE: Unto Others	HBO
22	PA 1-261-345	THE WIRE: Corner Boys	HBO
23	PA 1-261-344	THE WIRE: Know Your Place	HBO
24	PA 1-353-972	THE WIRE: Misgivings	HBO
25	PA 1-353-973	THE WIRE: A New Day	HBO
26	PA 1-353-974	THE WIRE: That's Got His Own	HBO
27	PA 1-261-346	THE WIRE: Final Grades	HBO
28	PA 1-611-976	THE WIRE: More With Less	HBO
	PA 1-608-341	THE WIRE: Unconfirmed Reports	HBO
	PA 1-798-349	THE WIRE: Not For Attribution	HBO
	PA 1-663-138	THE WIRE: Transitions	HBO
	PA 1-617-062	THE WIRE: React Quotes	HBO

1	PA 1-617-057	THE WIRE: The Dickenson Aspect	HBO
2			
3	PA 1-622-694	THE WIRE: Took	HBO
4	PA 1-622-990	THE WIRE: Clarifications	HBO
5	PA 1-622-995	THE WIRE: Late Editions	HBO
6	PA 1-622-993	THE WIRE: -30-	HBO
7	PA 1-743-069	TREME: Accentuate The Positive	HBO
8	PA 1-739-172	TREME: Everything I Do Gonh Be Funky	HBO
9	PA 1-750-437	TREME: On Your Way Down	HBO
10	PA 1-746-591	TREME: Santa Claus, Do You Ever Get The Blues?	HBO
11	PA 1-746-579	TREME: Slip Away	HBO
12	PA 1-746-582	TREME: Feels Like Rain	HBO
13	PA 1-746-583	TREME: Carnival Time	HBO
14	PA 1-756-008	TREME: Can I Change My Mind	HBO
15	PA 1-748-878	TREME: What Is New Orleans?	HBO
16	PA 1-748-782	TREME: That's What Lovers Do?	HBO
17	PA 1-748-781	TREME: Do Whatcha Wanna	HBO
18	PA 1-653-459	TRUE BLOOD: Strange Love	HBO
19	PA 1-653-432	TRUE BLOOD: The First Taste	HBO
20	PA 1-653-964	TRUE BLOOD: Mine	HBO
21	PA 1-653-970	TRUE BLOOD: Escape from Dragon House	HBO
22	PA 1-653-971	TRUE BLOOD: Sparks Fly Out	HBO
23	PA 1-653-570	TRUE BLOOD: Cold Ground	HBO
24	PA 1-653-568	TRUE BLOOD: Burning House of Love	HBO
25	PA 1-662-013	TRUE BLOOD: The Fourth Man in the Fire	HBO
26	PA 1-661-869	TRUE BLOOD: Plaisir D'Amour	HBO
27	PA 1-658-084	TRUE BLOOD: I Don't Wanna Know	HBO
28			

1	PA 1-663-958	TRUE BLOOD: To Love is to Bury	HBO
2			
3	PA 1-656-238	TRUE BLOOD: You'll Be the Death of Me	HBO
4			
5	PA 1-664-352	TRUE BLOOD: Nothing but the Blood	HBO
6			
7	PA 1-666-595	TRUE BLOOD: Keep This Party Going	HBO
8			
9	PA 1-666-589	TRUE BLOOD: Scratches	HBO
10			
11	PA 1-666-598	TRUE BLOOD: Shake and Fingerpop	HBO
12			
13	PA 1-666-592	TRUE BLOOD: Never Let Me Go	HBO
14			
15	PA 1-666-591	TRUE BLOOD: Hard-Hearted Hannah	HBO
16			
17	PA 1-667-523	TRUE BLOOD: Release Me	HBO
18			
19	PA 1-666-586	TRUE BLOOD: Timebomb	HBO
20			
21	PA 1-666-583	TRUE BLOOD: I Will Rise Up	HBO
22			
23	PA 1-666-596	TRUE BLOOD: New World in My View	HBO
24			
25	PA 1-663-479	TRUE BLOOD: Frenzy	HBO
26			
27	PA 1-667-580	TRUE BLOOD: Beyond Here Lies Nothin'	HBO
28			